

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

UNITED STATES OF AMERICA, *et al.*  
*ex rel.* ALEX DOE,

Plaintiffs,

v.

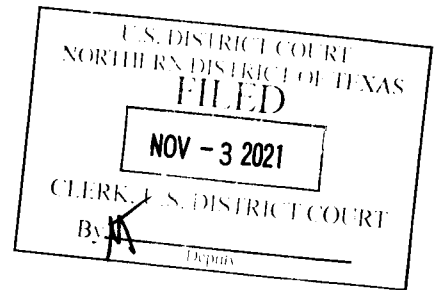
PLANNED PARENTHOOD  
FEDERATION OF AMERICA, INC.,  
PLANNED PARENTHOOD GULF  
COAST, INC., PLANNED  
PARENTHOOD OF GREATER TEXAS,  
INC., PLANNED PARENTHOOD  
SOUTHTexas, INC. PLANNED  
PARENTHOOD CAMERON COUNTY,  
INC., AND PLANNED PARENTHOOD  
SAN ANTONIO, INC.,

Defendants.

**SEALED**

Civil Action No. 2:21-CV-022-Z

FILED IN SEALED CASE



THE UNITED STATES OF AMERICA'S DECLINATION NOTICE

1. Pursuant to 31 U.S.C. § 3730(b)(4)(B), the United States of America respectfully notifies the Court of their decision not to intervene in this action.
2. Although the United States is declining to intervene, it respectfully refers the Court to the provisions of the False Claims Act, 31 U.S.C. § 3730(b)(1), which permit a relator to maintain the action in the name of the United States; provided, however, that the "action may be dismissed only if the Court and the Attorney General give written consent to the dismissal and their reasons for consenting." The United States requests that, should either Plaintiffs (including Relator) or Defendants propose that this action be

dismissed, settled, or otherwise discontinued, this Court solicit the written consent of the United States before ruling or granting its approval of such a request.

3. The United States further requests that pursuant to 31 U.S.C. § 3730(c)(3), Plaintiffs and Defendants serve all pleadings filed in this action upon the United States, and that all Orders issued by the Court also be sent to the undersigned government counsel.

4. The United States reserves its right to order any deposition transcripts and to intervene in this action, for good cause shown, at a later date pursuant to 31 U.S.C. § 3730(c)(3).

5. The United States finally requests that only the Complaint, the State of Texas's Notice of Election to Intervene, this Notice, and the Court's accompanying Order be unsealed and served upon Defendants. The United States asks that all other materials in this matter (including, but not limited to, any applications filed by the United States for an extension of time in which to intervene) remain under seal and not be made public or served on Defendants because in discussing the content and extent of the investigation, such papers are provided by law to the Court alone for the sole purpose of evaluating whether the seal and time for making an election to intervene should be extended.

6. A proposed Order accompanies this notice.

Respectfully submitted,

BRIAN M. BOYNTON  
ACTING ASSISTANT ATTORNEY  
GENERAL

CHAD E. MEACHAM  
ACTING UNITED STATES ATTORNEY



---

J. SCOTT HOGAN  
Assistant United States Attorney  
Texas Bar No. 24032425  
1100 Commerce Street, Third Floor  
Dallas, Texas 75242  
Telephone: 214-659-8600  
Facsimile: 214-659-8807  
Email: [scott.hogan@usdoj.gov](mailto:scott.hogan@usdoj.gov)

JAMIE A. YAVELBERG  
ANDY MAO  
YOLONDA Y. CAMPBELL  
Attorneys, Civil Division  
U.S. Department of Justice  
P.O. Box 261, Ben Franklin Station  
Washington, DC 20044  
Telephone: 801-325-3360  
Facsimile: 202-307-6364  
Email: [yolonda.y.campbell@usdoj.gov](mailto:yolonda.y.campbell@usdoj.gov)


Attorneys for the United States of America

CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2021, a copy of the foregoing pleading and proposed Order were mailed by email and first class mail to:

Andrew B. Stephens  
Heather Gebelin Hacker  
HACKER STEPHENS LLP  
108 Wild Basin Rd. South, Suite 250  
Austin, Texas 78746

RAYMOND C. WINTER  
Chief, Civil Medicaid Fraud Division  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711-2548

  
\_\_\_\_\_  
J. SCOTT HOGAN  
Assistant United States Attorney

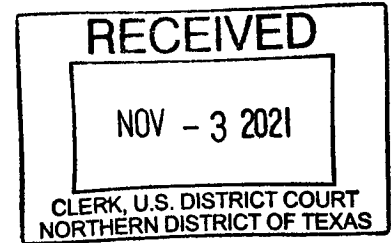


THE UNITED STATES ATTORNEY'S OFFICE *for the*  
NORTHERN DISTRICT *of* TEXAS

GWENDOLYN BYERS, *Paralegal Specialist*

1100 Commerce Street, 3rd Floor Telephone: 214.659.8600  
Dallas, Texas 75242

November 2, 2021



United States District Clerk  
Northern District of Texas  
Amarillo Division  
205 SE 5<sup>th</sup> Avenue, Room 133  
Amarillo, Texas 79101

Re: Civil Action No. 2:<sup>21</sup>~~19~~-CV-022-Z *Sealed Case*

Dear Clerk of the Court:

Enclosed is the original and two copies of the pleadings to be filed in the above-referenced sealed case. A Proposed Order is also enclosed.

A pre-addressed, postage paid envelope is enclosed for your use in returning file-marked copies to our office. Please contact me at 214.659.8621 if you have any questions.

Sincerely,

*Gwendolyn Byers*

Gwendolyn G. Byers, CFE  
Paralegal Specialist